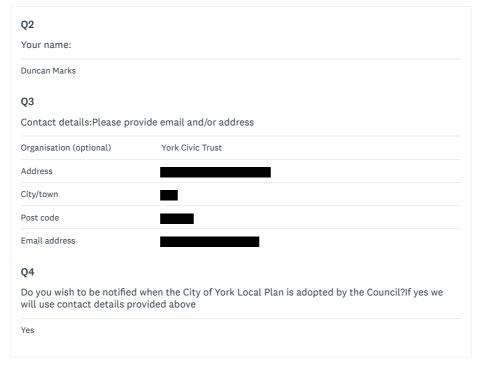


Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation



Page 3: Your response

0.5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

Proposed Main Modifications - link

Share Link

COPY





To which section does this response relate?

Section 8: Placemaking, Heritage, Design and Culture

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

MM8.7 Policy D5: Listed Buildings

Page 12: Section 9: Green Infrastructure

COPY

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 17: Section 15: Delivery and Monitoring

019

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Respondent skipped this question

If you object, please select your reason from the list below (select all that apply):

Respondent skipped this question

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

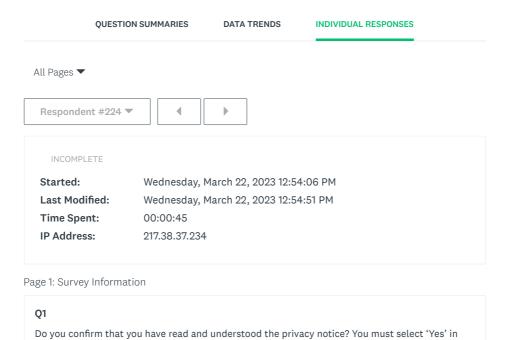
transport will depend on a smaller market. For these reasons we suggest that the communities will not be sustainable, the Plan is unsound in relation to the NPPF and these questions should be revisited before the Local Plan is signed off. For example, SS4 on York Central now only has 959 dwellings planned for completion in the plan period, compared with 1,500 in earlier versions. ST15 now only has 560 dwellings in the plan period, instead of 2,200. We would strongly recommend the production of Supplementary Planning Guidance on Developing Sustainable Communities. This could draw on York Civic Trust's earlier research and workshops on this topic. We address the issue of density and viable transport provision in our comments on Transport Policies (Section 14) [Note: at the moment we don't do this! We need to check where this should best go; it is partly covered under Section 2]. We note that Policy H2 covers the question of density, but without any re

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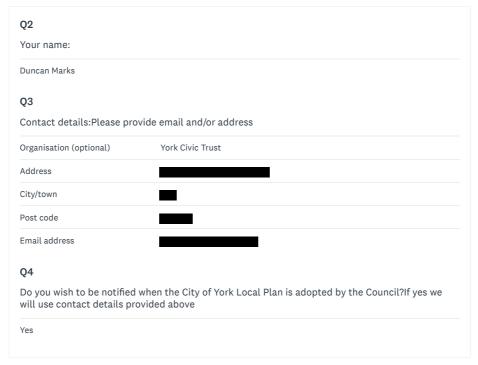






Page 2: Register for consultation

order to take the survey.



Page 3: Your response

0.5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

Proposed Main Modifications - link

Share Link

COPY





To which section does this response relate?

Section 8: Placemaking, Heritage, Design and Culture

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

MM8.15 Policy D10: York City Walls and St Marys Abbey Walls (York Walls)

Page 12: Section 9: Green Infrastructure

Share Link COPY

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 17: Section 15: Delivery and Monitoring

019

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Respondent skipped this question

If you object, please select your reason from the list below (select all that apply):

Respondent skipped this question

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

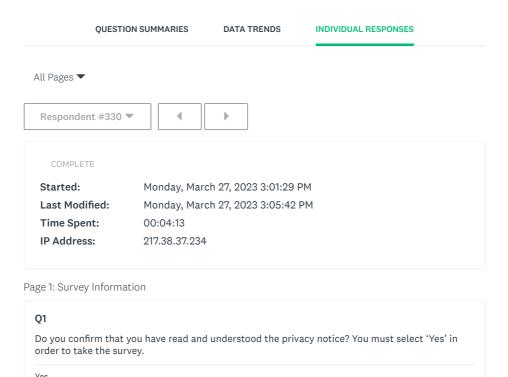
Respondent skipped this question

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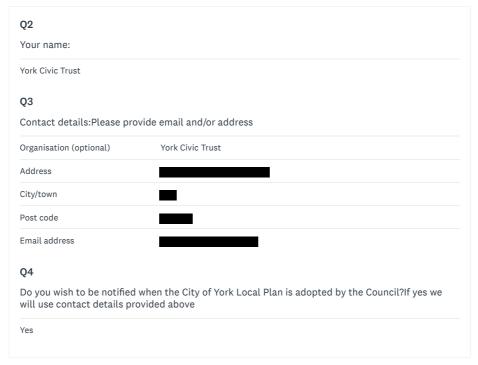








Page 2: Register for consultation



Page 3: Your response

0.5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

Proposed Main Modifications - link

Share Link







To which section does this response relate?

Section 2: Vision

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

MM2.3 Policy DP2: Sustainable Development

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

COPY

Q13

To which modification does this response relate?

Respondent skipped this question

Page 12: Section 9: Green Infrastructure

Share Link

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

019

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

If you object, please select your reason from the list below (select all that apply):

Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

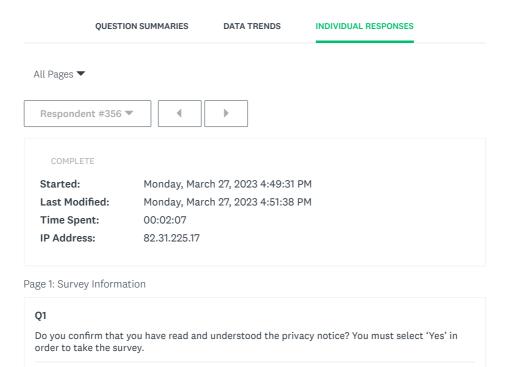
We recommend that the following list be added to MM 2.3 so it reads: "Mitigate and adapt to climate change through designing new communities and buildings, transport networks and services that support each community to be energy and resource efficient and reduce carbon emissions. This can be achieved by their being of mixed use and high density; designed around high-quality walking and cycling routes; providing a core set of community facilities safely and conveniently accessible on foot or by bicycle; ensuring the provision of high quality public transport routes to key destinations; and by managing servicing traffic and to accommodate appropriate emerging technologies."

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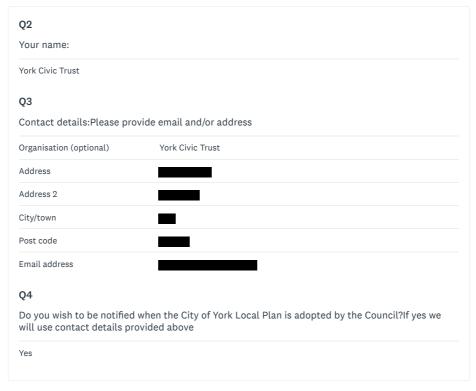








Page 2: Register for consultation



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

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Q6

To which section does this response relate?

Section 3: Spatial Strategy

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

MM3.10 Policy SS4: York Central

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

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COPY

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

 $\label{lem:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma$

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

Not consistent with national policy - i.e. doesn't comply with the law

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

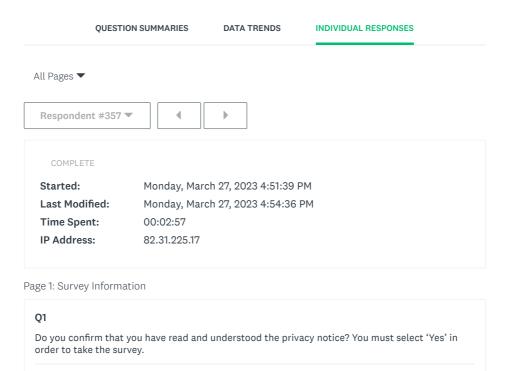
York Civic Trust recognise the impact of the delays in finalising York's draft Local Plan on the Housing Trajectory for York, and the wider economic factors the reduction in the quantum of development within the plan period for ST5 York Central, from a minimum of 1500 (2018) to around 950 dwellings (August 2022). We would strongly recommend the production of Supplementary Planning Guidance on Developing Sustainable Communities to aide this. However, given the very high upfront investment costs, this places into question the ability of the site to also deliver the range of facilities and services to make this a genuine sustainable community within the plan period and ultimately the soundness of the plan. York Civic Trust believes that the scale of the development proposed by SS4 York Central does not meet the requirements of NPPF 2012 Paras 7, 17 & 70, even more so of the now current NPPF 2021 para 73 b) and therefore MM3.10 is unsound.

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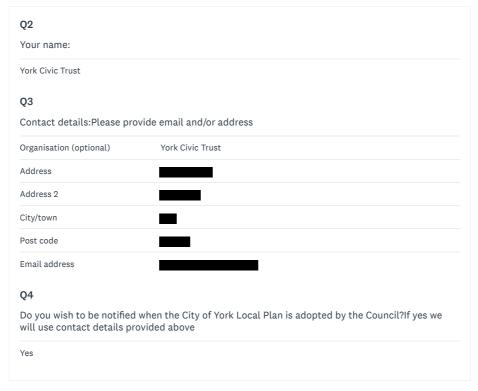








Page 2: Register for consultation



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

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Q6

To which section does this response relate?

Section 3: Spatial Strategy

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

MM3.12 Policy SS5: Castle Gateway

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Share Link

COPY

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

015

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

 $\label{lem:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma$

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

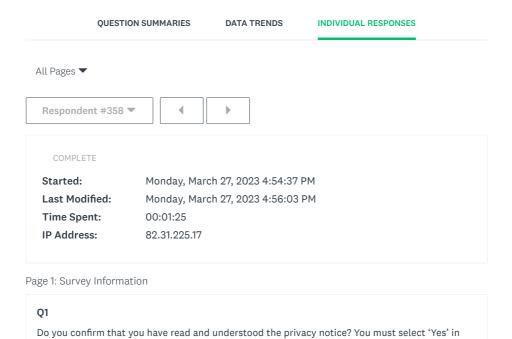
York Civic Trust accepts the reasoning for the transferral of the list of deliverables to the explanation section (para 3.33A). This does create, however, some disparities within the principles of the sub-areas. For clarity along with Modification MM3.12 the Civic Trust recommends Principle xi (sub-area Castle and the Eye of York) to insert wording to read 'Create a public realm scheme for the Castle and Eye of York, which celebrates the significance of historic assets and the setting of the historic Castle and prison by removing the Castle Car Park.' This will correspond with the retained text 'Provision of a replacement car park within the Castle Gateway area' (moved to explanation in MM3.14), and be reinforced by principle xvii under sub-area St George's Field, which reads: 'Consider the opportunity to provide a new multi-storey car park on the site of existing surface level parking at St. George's Field to replace the existing parking at Castle Car Park'.

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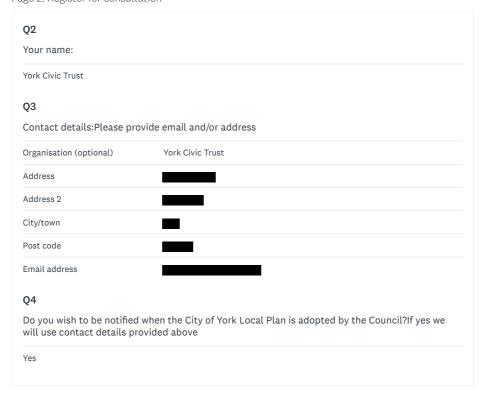






Page 2: Register for consultation

order to take the survey.



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

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Q6

To which section does this response relate?

Section 3: Spatial Strategy

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

MM3.41 Policy SS12: Land West of Wigginton Road

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Share Link

COPY

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

015

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

 $\label{lem:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma$

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

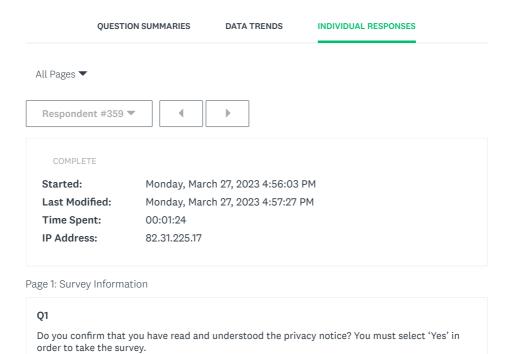
There is a minor but important error in the modification to this text. It says "The transport and highways impacts of the site development individually and cumulatively should be assessed with sites ST7, ST8, ST9, and ST15." The equivalent modified wording for SS9, 10, 11 and 13 reads "... of the site development should be assessed individually and cumulatively with ...". The distinction is important because the latter makes clear the site's impacts need to be assessed individually as well as cumulatively. We recommend this minor correction to the wording of SS12 to read "... be assessed individually and cumulatively with ...".

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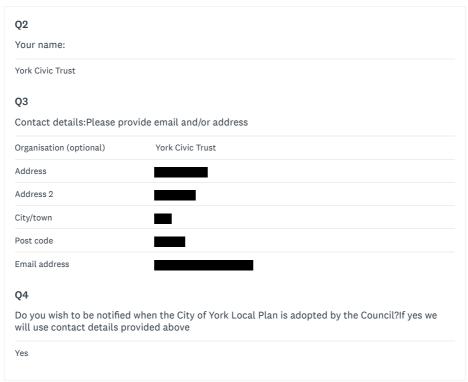








Page 2: Register for consultation



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.





Q6

To which section does this response relate?

Section 3: Spatial Strategy

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

MM3.47 Policy SS13: Land West of Elvington Lane

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Share Link

COPY

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

015

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

Not consistent with national policy - i.e. doesn't comply with the law

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

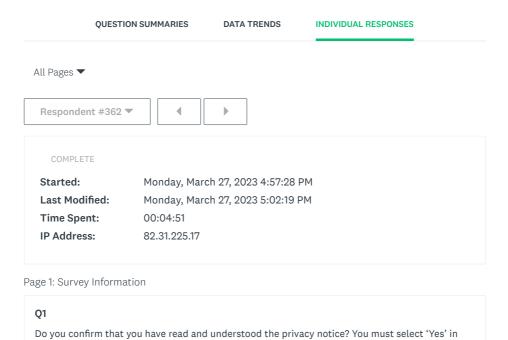
York Civic Trust is concerned that the reduction in the quantum of development for ST15 as set out in SS13, from around 2,200 dwellings to an expectation of 560 dwelling within the plan period, will not create a sustainable community as required in NPPF 2012 Para 52, or, because of the very high transport infrastructure costs, meet the linked services requirements of NPPF 2012 Paras 7, 17 & 70. This is even more clear when judged against NPPF 2021 para 73 b): 'ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;' including the omission of any on-site employment allocations.

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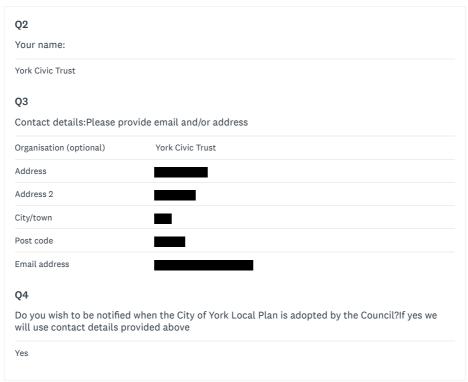






Page 2: Register for consultation

order to take the survey.



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.





Q6

To which section does this response relate?

Section 3: Spatial Strategy

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

MM3.54 Policy SS13: Land West of Elvington Lane

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Share Link

COPY

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

Not effective - i.e. it won't work

Not consistent with national policy - i.e. doesn't comply with the law

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

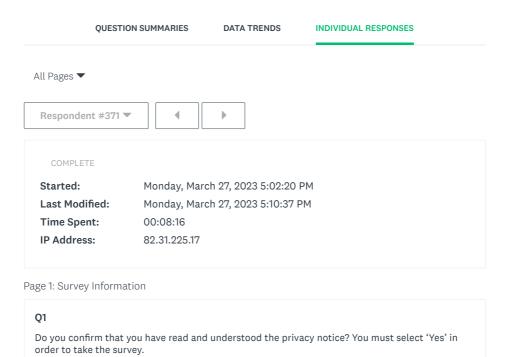
The Sustainable Transport Study for the site (EX/CYC/89) fails to identify adequate active travel or public transport links to the site, including active travel routes to ST26 or the secondary school in Fulford. There is no mention of bus rapid transit or bus priority, both of which are specified as key principles. No dedicated services are proposed to York city centre or other key destinations. No service is offered to central Leeds, even though all of these requirements are identified in the report. No reference is given to a new segregated overpass across the A64, even though this is specified in para 25 of EX/CYC/79. The modified policy is therefore non-compliant with NPPF 2012 Para 17, 28, 32, 35, 41, 58 & 156, or DfT's 2015 guidance on Transport evidence bases in plan making paras 2, 3, 5 & 8. We recommend the Council commissions a report which identifies the additional sustainable travel infrastructure and services required, and to reflect this in an early update to the plan.

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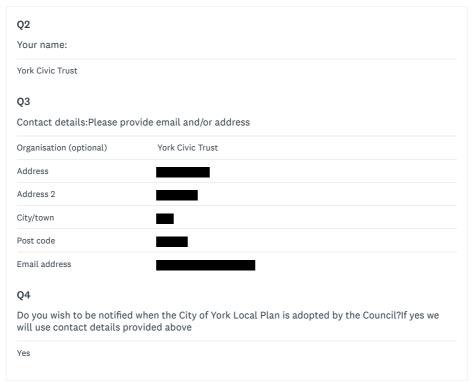








Page 2: Register for consultation



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

COPY





Q6

To which section does this response relate?

Respondent skipped this question

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Share Link

COPY

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

015

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

EX/CYC/89 - Sustainable Transport Study By Wood July 2022

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Object

Q23

If you object, please select your reason from the list below (select all that apply):

Not effective - i.e. it won't work

Not consistent with national policy - i.e. doesn't comply with the law

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

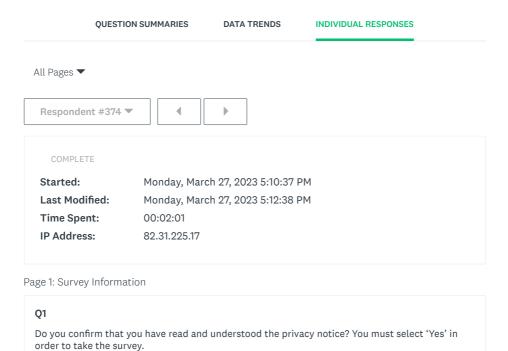
This report fails to identify the infrastructure provision needed to satisfy its own principles. No detail is given for: cycle routes to ST26 or to Fulford School; the costs of cycling provision (even though EX/CYC/79 commits to £4m of developer funding); a new segregated overpass across the A64 (even though this is specified in para 25 of EX/CYC/79); and no mention of bus rapid transit or bus priority. No dedicated services are proposed to York city centre, central Leeds, or other key destinations. The only dedicated route proposed is to the University, but routed via Common Lane, which is supposed to be vehicle-free. EX/CYC/89 should is inadequate against the requirements of NPPF2012 Paras 17, 28, 32, 35, 41, 58 & 156, and DfT's 2015 Transport evidence bases in plan making paras 2, 3, 5 & 8. We recommend the Council commissions a report which identifies the additional sustainable travel infrastructure and services required, and to reflect this in an early update to the plan.

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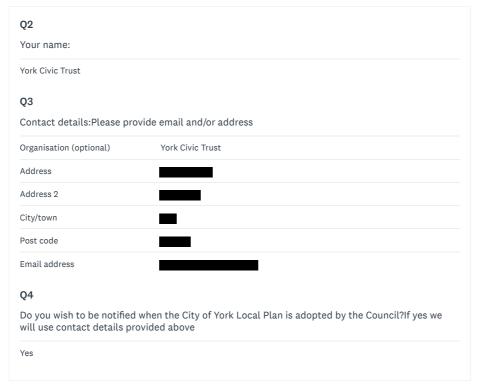








Page 2: Register for consultation



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.





Q6

To which section does this response relate?

Section 3: Spatial Strategy

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

MM3.77 Policy SS22: University of York Expansion

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Share Link

COPY

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

015

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

 $\label{lem:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma$

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Q23

If you object, please select your reason from the list below (select all that apply):

Not positively prepared - i.e. strategy will not meet development needs

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

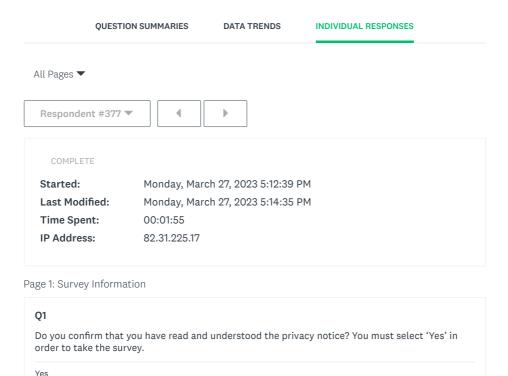
We are concerned that the modifications to this include an expectation to "Explore feasibility of a junction on the A64 to the south of the site with delivery in conjunction with ST15". This is totally incompatible with the subsequent explanation which states that the site is designed to be car-free (para 3.100) and that all vehicular access is to be via Kimberlow Lane (para 3.101). A new access from the outer ring road would be used predominantly by private car traffic, and would offer a new, and otherwise uncontrolled, route to the city centre through the middle of the university East Campus. This would significantly add to the transport problems arising from development, while providing little or no benefit to this strategic site. It is thus not a positively prepared addition to the Plan. We strongly recommend that this addition be deleted.

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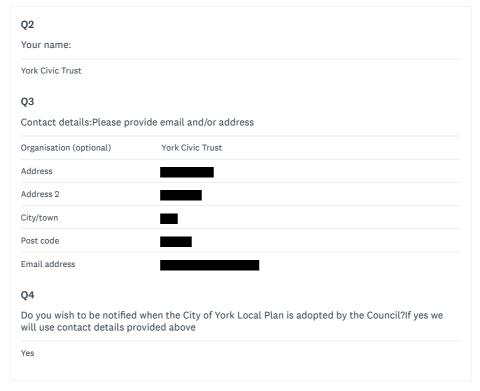








Page 2: Register for consultation



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

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Q6

To which section does this response relate?

Section 5: Housing

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

MM5.1 Policy H1: Housing Allocations

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Share Link

COPY

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

 $\label{lem:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma$

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Q23

If you object, please select your reason from the list below (select all that apply):

Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

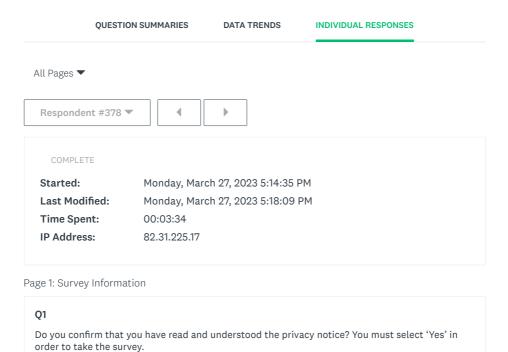
York Civic Trust welcomes the additional criterion for 'For sites that contain existing open space (**), where appropriate, it should be retained on-site or re-provided off-site.' However, we believe that off-site provision should be an avenue of last resort as it facilitates the progressive reduction of open space where it is of most benefit and value. For the same reason evaluation of the open space provision, particularly where there was existing open space serving the wider area needs to be in the context of the levels & types of open space and required provision in the locality as NPPF makes clear. We recommend the removal of this aspect of the proposed modification as it is ineffective and therefore unsound, and for the original open space text to be reinstated.

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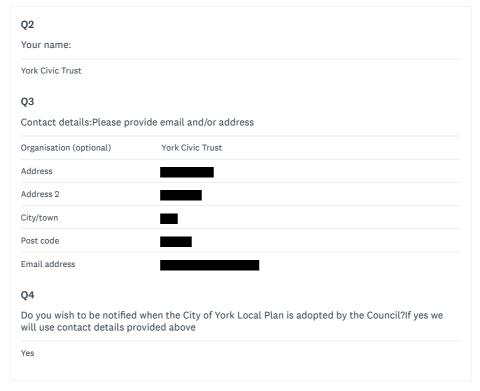








Page 2: Register for consultation



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.





Q6

To which section does this response relate?

Section 5: Housing

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

MM5.8 Policy H3: Balancing the Housing Market

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Share Link

COPY

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

 $\label{lem:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma$

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Q23

If you object, please select your reason from the list below (select all that apply):

Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

Within the modified wording York Civic Trust rejects the new phrase 'will expect developers to provide housing solutions that contribute to meeting York's housing need as identified ..' is a major weakening of the previous policy wording that makes achieving a balance unachievable in practice contrary to NPPF 2012 paras 17 (planning principle 3) and 50. We argue that the previous wording of the clause that the Council 'will seek to balance the housing market across the plan period and work towards a mix of housing identified...Proposals will be required to balance the housing market ..' should be reinstated to restore the Local Plan's soundness, particular when judges against the evidence from the 2021 census of the complete failure to deliver the required levels of family accommodation for the local population (see attached supporting document).

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York Civic Trust Statutory Consultation on York's draft Local Plan

SUPPORTING DOCUMENT TO OBJECTION TO MM5.8

Policy H3: Balancing the Housing Market

We consider the proposed modification MM5.8 to policy H3 is unsound. The history of housing permissions over the last 8 years since the original evidence base for the Local Plan was assembled, show a massive imbalance in the mix of housing that has come forward, with a preponderance of student housing and up market flatted accommodation appealing to the London and the south-east downsizer, Chinese investment, buy to let and holiday let markets, leading to / coincident with a major failure to provide family and local market housing. The 2021 census results compared with the previous ONS projections used in the plan's evidence base clearly demonstrate the negative social consequences for the city that has resulted with a major hollowing out of the 25–54 year old and related children and young people 0 -14 demographic of the city.

2011-2021 Change %	Children			Heavily Student No. influenced		Working / Family aged					
	0-4	5-9	10-14	15-19	20-24	25-29	30-34	35-39	40-44	45-49	50-54
England	-7	13	11	-4	-5	2	13	7	-8	-7	15
York	-19	6	6	8	3	-8	3	0	-13	-13	11
Difference	-12	-7	-5	+12	+8	-10	-10	-7	-5	-6	-4

Extracted from: York population change, Census 2021 – ONS

It can reasonably concluded with such a clear and significant difference in the demographic changes in the city, coupled with evidence on the cities continuing above the norm increases in house prices and rents that have been aired and evidenced in earlier phases of the enquiry that we have, on top of the difficult national housing picture, an exceptional locally specific housing market failure which only the Local Plan can address.

It also flags that the Councils latest Local Housing Needs Assessment (Ex/CYC/92) which relies on the markedly inaccurate previous ONS projections, with only a modest adjustment as referred to in paras 1.7 and 1.8 is therefore also seriously flawed and unsound as the plan is therefore not justified. Consequently the conclusions in subsequent paras 1.9 & 1.10, particularly that it supports a

750-780 jobs per annum and therefore the plans economic ambitions is jeopardised and is also unsound.

It is therefore extremely worrying that the relatively robust policy approach in the original policy H3 that "Proposals for residential development will be required to balance the housing market by including a mix of types of housing which reflects the diverse mix of need across the city. This includes flats and smaller houses for those accessing the housing market for the first time, family housing of 2 to 3 beds and homes with features attractive to older people." is proposed to be deleted and replaced by a vague requirement to "maintain, provide or contribute to meeting York's housing needs". The modification will therefore be ineffective and unsound and we ask the Inspectors to reject this proposed modification.

We would also go further given the seriousness and scale of the particular market failure York is experiencing. We would suggest the policy section should be strengthened by a more robust identification of the housing mix that needs to be provided and the expectations of what should be delivered by the different sites in response. We would suggest that all the strategic sites should have an identified target mix – this could be added into Table 5.1 in Policy H1. The exercise of doing so will enable the Inspectors to see that the plan is able to deliver in overall terms the required mix against an updated LHNA that addresses the accumulated impacts of the unanticipated expansion of the off campus student housing market, etc., and failure to deliver for the family and local housing markets and need to catch up on the backlog of the latter. Otherwise we will see present trends continued in the next few years of the plan, and unreasonable and possibly undeliverable expectations for the mix on sites that come forward later.

If the Inspectors feel unable at this stage to press the Council to undertake this further work, we would suggest a compromise of adopting a robust, standalone policy along the lines of Oxford Local Plan policy H4 (where they have similar exceptional local housing market failures) but adjusted appropriately for the corrected York housing needs picture:

Policy H4: Mix of dwelling sizes

Planning permission will be granted for residential development that is demonstrated to deliver a balanced mix of dwelling sizes to meet a range housing needs and create mixed and balanced communities.

Proposals for 25 or more homes (gross) (C3 residential), or sites of 0.5 ha. and greater, and which are outside of the city centre or district centres, will be expected to comply with the following mix of unit sizes for the affordable element, where it is feasible (this does not apply to employer-linked affordable housing):

1 bedroom homes	20-30%
2 bedroom homes	30-40%
3 bedroom homes	20-40%
4+ bedroom homes	8-15%

Sites below the threshold or within the city centre or a district centre should demonstrate how the proposal has had regard to local housing demand, including for affordable housing demonstrated by the housing register.

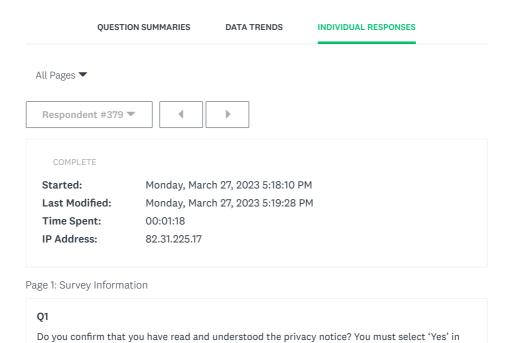
We would ask that alongside this the Inspectors make a recommendation to the Council in their report for an early review of the adopted plan along the lines of our first suggested approach. Without this strengthening the plan will be ineffective and unsound.

There should also be a policy requirement on the LPA to monitor and publish, say annually, the cumulative tally of housing types being granted permission and being delivered against the cumulative housing need evidenced for this to be taken into account in future applications - the current housing monitoring section of the plan fails to cover the balance issue.



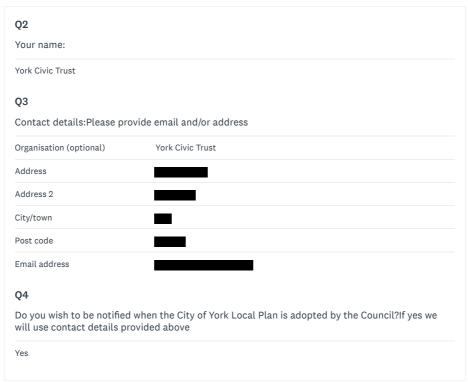






Page 2: Register for consultation

order to take the survey.



Page 3: Your response

Q

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.





Q6

To which section does this response relate?

Section 5: Housing

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

MM5.21 Policy H10: Affordable Housing

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Share Link

COPY

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

015

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

 $\label{lem:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma$

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Q23

If you object, please select your reason from the list below (select all that apply):

Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

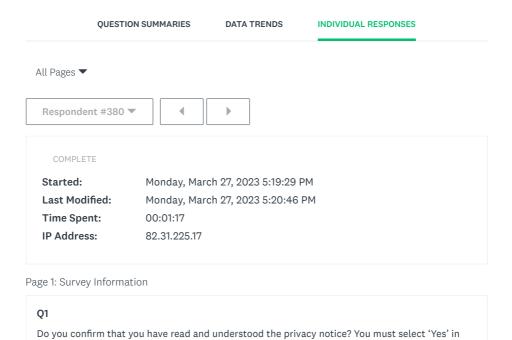
MM5.21 sets out a target of 3265 affordable dwellings through the Local Plan. MM3.1 Policy SS1 sets an aspirational target for the Council to deliver at least 4228 affordable dwellings (only 45% of those needed to meet the needs of residents) an additional 963 dwellings on that which can be delivered by MM5.21 and others MM's. There is no evidence of methodology presented within the draft Local Plan as to how this will be achieved and should be addressed if the plan is to be effective.

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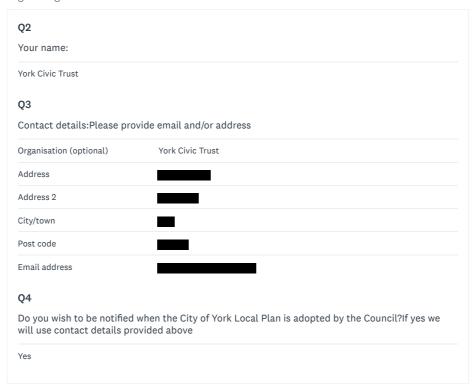






Page 2: Register for consultation

order to take the survey.



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

Share Link







Q6

To which section does this response relate?

Section 8: Placemaking, Heritage, Design and Culture

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

MM8.4 Policy D3: Cultural Provision

Share Link

COPY

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

 $\label{lem:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma$

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Q23

If you object, please select your reason from the list below (select all that apply):

Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

Paragraph 8.22 defines, promotes, and facilitates cultural wellbeing, the requirements for which are to be outlined in a Council-produced SPD as way of a Cultural Wellbeing Plan. We fully support this inclusion. Since the modification consultation began in January 2023, however, several SPDs in the draft local plan have been withdrawn by the Council's Executive, including the Cultural Wellbeing SPD. (CYC Executive, 26th January 2023 (see Agenda Item 75. City of York Local Plan, paragraphs 29-42:

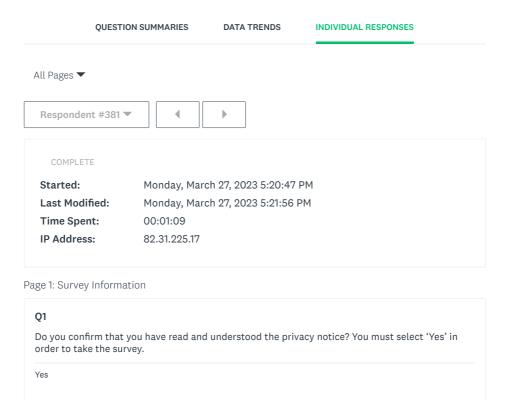
https://democracy.york.gov.uk/ieListDocuments.aspx?CId=733&MId=13294&Ver=4). We oppose the withdrawal of these SPDs on the grounds that they will make the Local Plan unsound, especially where, such as Policy D3, delivery of the plan is solely reliant on a formerly proposed and now 'dropped' SPD.

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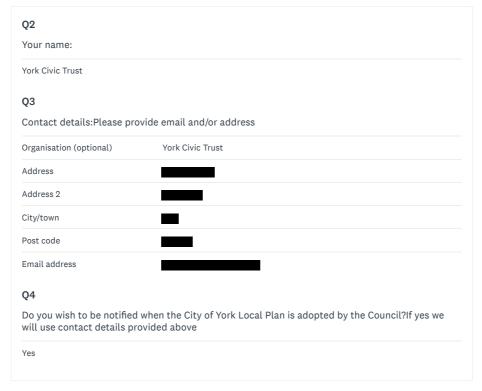








Page 2: Register for consultation



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

Share Link







Q6

To which section does this response relate?

Section 8: Placemaking, Heritage, Design and Culture

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

MM8.5 Policy D4: Conservation Areas

Share Link

COPY

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

015

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

 $\label{lem:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma$

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Q23

If you object, please select your reason from the list below (select all that apply):

Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

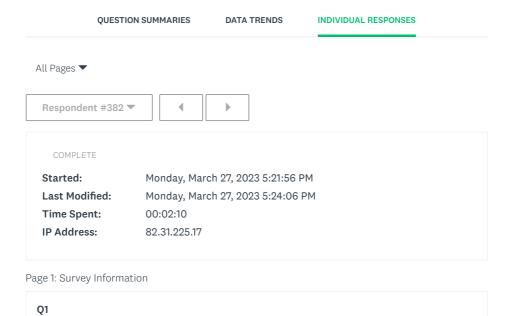
Historic England's Conservation Principles, Polices and Guidance (2008) underpins heritage conservation protocol and advice in England. It directly informed NPPF 2012 and introduced analysis of heritage assets (including Conservation Areas) through their 'values' and understanding of 'significance'. Removing reference to 'significance' of a conservation area in MM8.5 would be a backward step which weakens the Local Plan. Retaining reference to it would help comply with NPPF 2012 paragraphs 128-29, 132-35, 137-39, 141, 154. It would also be consistent with proposed modifications in the consultation, notably MM8.6 - MM8.15; AM 8.12 (8.25). Reference to significance in MM8.5 should be changed to read: "Changes of use will be supported when it has been demonstrated that the beneficial current uses of the building can no longer be sustained, where the proposed new use would not significantly harm the prevailing significance, including character, of the Conservation Area".

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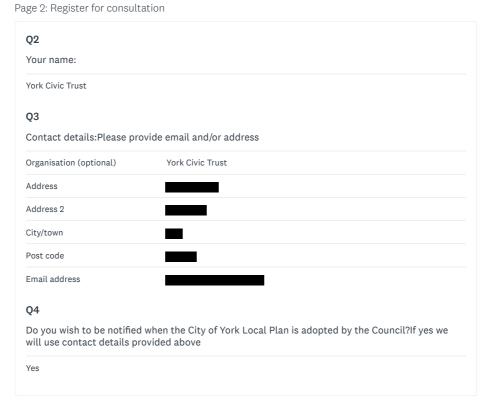






Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in

order to take the survey.



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

Share Link COPY





Q6

To which section does this response relate?

Section 8: Placemaking, Heritage, Design and Culture

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

MM8.12 Policy D7 Explanation - paragraphs 8.35 to 8.37

Share Link

COPY

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

015

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

 $\label{lem:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma$

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Q23

If you object, please select your reason from the list below (select all that apply):

Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

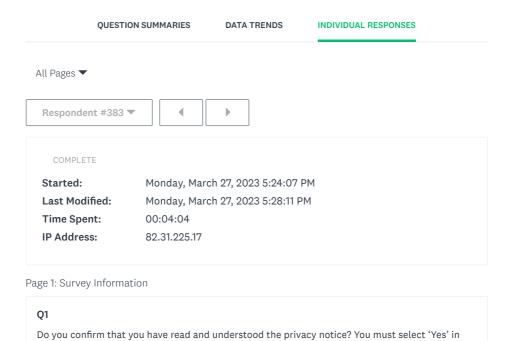
Reference is made to "In advance of the adoption of a Local List, applicants should consult relevant evidence alongside the policy's clear local criteria to identify non-designated heritage assets. ... Any development proposals that relate to non- designated heritage assets and their settings must be accompanied by an assessment of their significance in line with the criteria in Policy D7." There is no indication, however, of what applicants should do after adoption of a Local List in York. We recommend the following addition: "Once the Local List is adopted, applicants should base their proposals on the requirements of that List."

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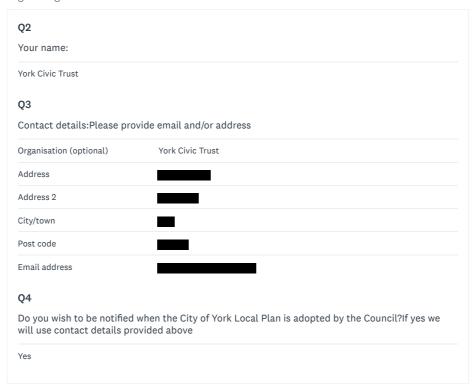






Page 2: Register for consultation

order to take the survey.



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.





Q6

To which section does this response relate?

Section 8: Placemaking, Heritage, Design and Culture

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

MM8.12 Policy D7 Explanation - paragraphs 8.35 to 8.37

Share Link

COPY

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

015

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

 $\label{lem:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma:lemma$

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Q23

If you object, please select your reason from the list below (select all that apply):

Not positively prepared - i.e. strategy will not meet development needs

Not effective - i.e. it won't work

Q24

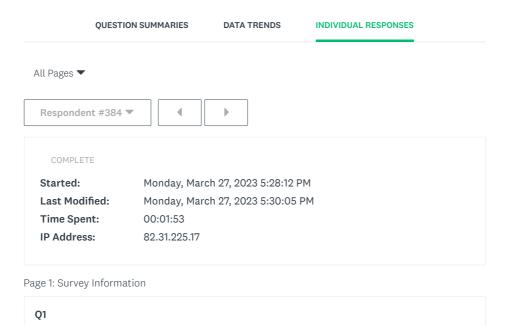
Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

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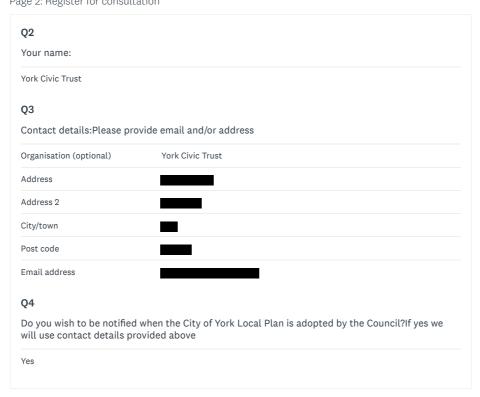




Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in

Page 2: Register for consultation

order to take the survey.



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

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Q6

To which section does this response relate?

Section 8: Placemaking, Heritage, Design and Culture

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

MM8.12 Policy D7 Explanation - paragraphs 8.35 to 8.37

Share Link

COPY

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

015

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Q23

If you object, please select your reason from the list below (select all that apply):

Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

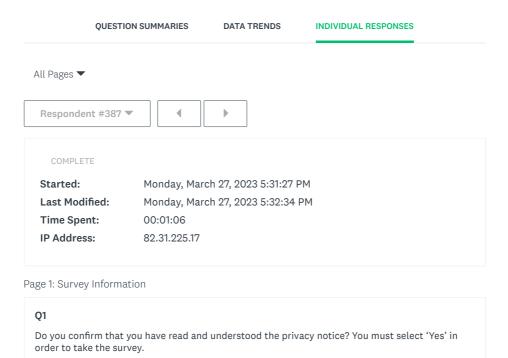
In order to make Policy D7 effective, York Civic Trust requests that under 'Delivery: 'Key Delivery Partners' [Under 8.38] to add 'York Civic Trust'. The reason for this is that when the York Open Planning Forum discontinued in 2018, its work creating a nominated Local Heritage List for York was passed to York Civic Trust. The physical and digital copies of the compiled Local Heritage List and website are now in the custodianship of the Civic Trust and for the betterment of York's communities.

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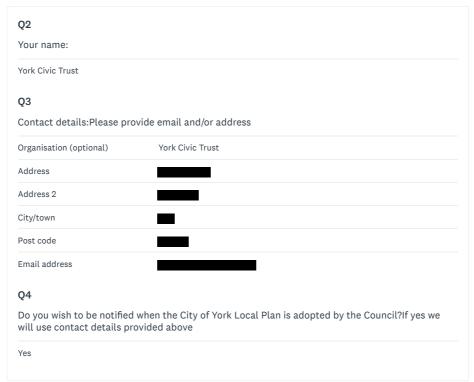








Page 2: Register for consultation



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

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Q6

To which section does this response relate?

Section 9: Green Infrastructure

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

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COPY

To which modification does this response relate?

MM9.3 Policy GI2: Biodiversity and Access to Nature

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Q23

If you object, please select your reason from the list below (select all that apply):

Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

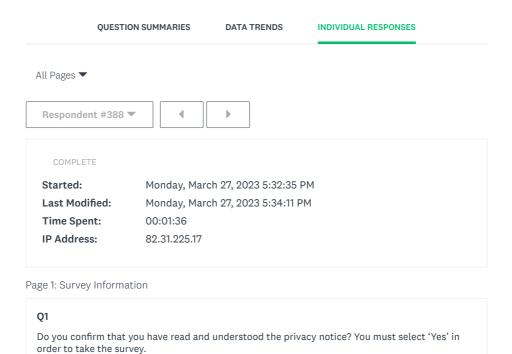
The reason given for changes to Policy G12 is so that it "Ensures appropriate distinctions are made between different levels in a hierarchy of nature sites in accordance with paragraph 113 of the NPPF (2012). Consistent with Natural England's July 2019 response to the Regulation 19 consultation" (MM9.2) and "New criterion to reference ancient woodland and veteran trees, bringing into the Development Plan the NPPF requirement" (MM9.3). We question the policy's effectiveness in relying on NPPF2012 rather than the more expansive NPPF2021, especially as reference is often made in the Modifications to post-2012 national legislation and advice: The Environment Act of 2021 (see MM9.3, 9.5) and its update 'expected November 2023' (MM9.5), and Natural England's Supplementary Advice (2019) (MM9.6). We recommend reference is made to the NPPF2021 for this policy. York Civic Trust remains disappointed that there is no commitment to updating the evidence base (such as the biodiversity audit).

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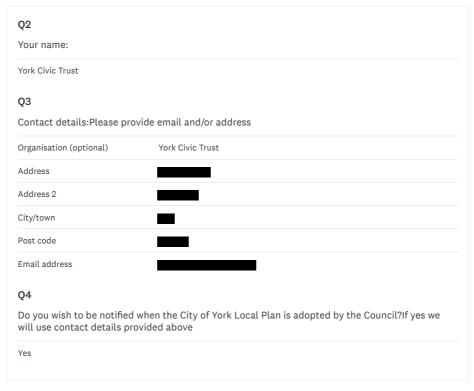








Page 2: Register for consultation



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.





Q6

To which section does this response relate?

Section 11: Climate Change

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Share Link

COPY

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

015

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

MM11.1 Policy CC1: Renewable and Low Carbon Energy Generation Storage

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Q23

If you object, please select your reason from the list below (select all that apply):

Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

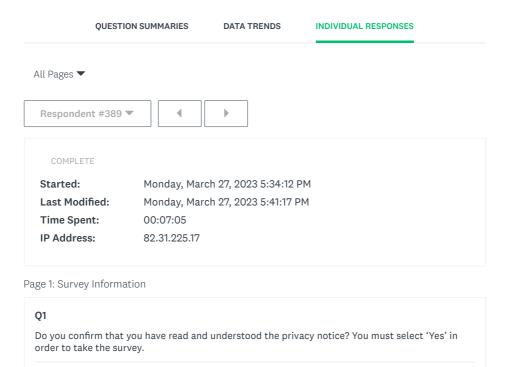
Para 11.1 as modified states that "The policies contained with this section are central to fulfilling the aspirations of the York Climate Change Strategy". The Major Modifications proposed do not support this statement. Policies CC1-3 only deal with renewable energy, new domestic and non-domestic buildings, and district heating. The Climate Change Strategy indicates that buildings only cover 62% of current carbon emissions. But Policy CC2 only focuses on new buildings, with no proposals for the current, typically energy-inefficient, existing building stock. Equally, Policies CC1-3 make no reference to the range of carbon sequestration methods that will be essential to meet the 88% reduction in carbon emissions needed to achieve net zero. We recommend that the modification in Para 11.1 be revised to link to the other parts of the Local Plan needed to deliver the Strategy, including Sections 9 (for sequestration), 13, 14 and Policies C1, DP2 and SS1 (for their impacts on travel).

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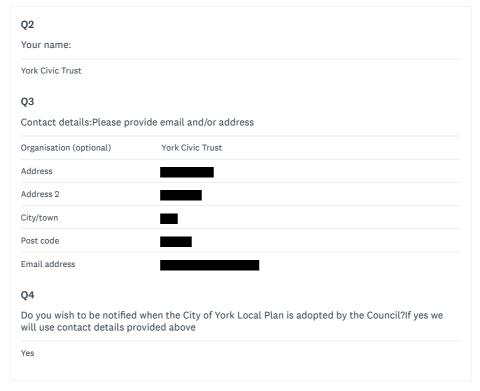








Page 2: Register for consultation



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

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Q6

To which section does this response relate?

Section 11: Climate Change

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

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COPY

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

015

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

MM11.3 Policy CC1 explanation - paragraph 11.8 - 11.11

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Q23

If you object, please select your reason from the list below (select all that apply):

Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

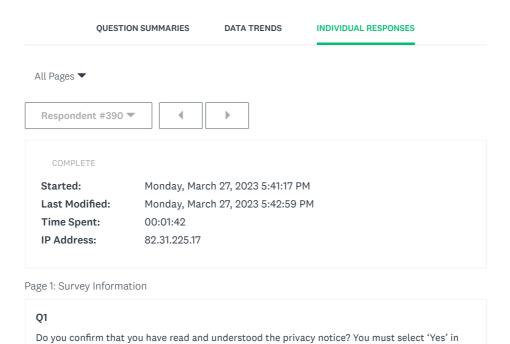
Under AM11.3, and in order to compliment City of York Council's Renewable Energy Study (2014) – ref SD117, which identifies a number of suitable wind locations in York - we recommend reinstating the use of the word 'wind' as a possible renewable energy source.

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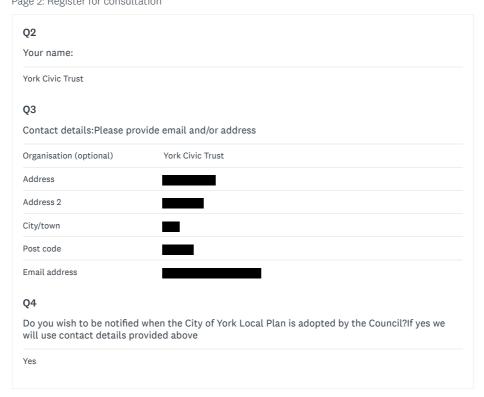






Page 2: Register for consultation

order to take the survey.



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.





Q6

To which section does this response relate?

Section 11: Climate Change

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Share Link

COPY

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

MM11.12 Policy CC2 explanation - paragraph 11.18 - 11.23

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Q23

If you object, please select your reason from the list below (select all that apply):

Not effective - i.e. it won't work

Not consistent with national policy - i.e. doesn't comply with the law

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

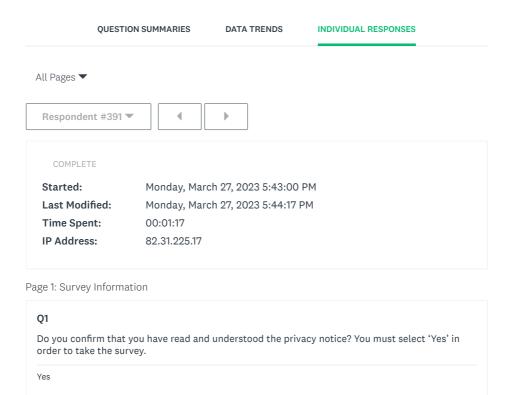
The deletion of paras 11.19 to 11.21 removes the Council's commitment to "support home owners in delivering (energy) efficiency improvements". This is incompatible with the Council's target of retrofitting 32,700 dwellings by 2030. It also fails to satisfy the NPPF 2012 (Para 152) requirement that Planning Authorities "should support the transition to a low carbon future in a changing climate, taking full account ... [to] encourage the reuse of existing resources, including the conversion of existing buildings...". Assurances were given by the Council during Phase 4 that the Paras 11.19 and 11.20 references would be reinstated, but this has not happened. Thus the Plan as drafted is unsound in providing no basis for planning officers to support, or require, energy efficiency improvements in existing buildings. We recommend that a Policy CC4 is added to support planning conditions for home- and non-domestic building owners to increase the energy efficiency of their properties.

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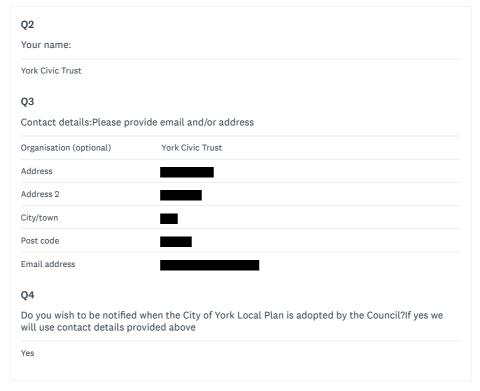








Page 2: Register for consultation



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.





Q6

To which section does this response relate?

Section 12: Environmental Quality and Flood Risk

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Share Link

COPY

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

015

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

MM12.1 Policy ENV1: Air Quality

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Q23

If you object, please select your reason from the list below (select all that apply):

Not effective - i.e. it won't work

Not consistent with national policy - i.e. doesn't comply with the law

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

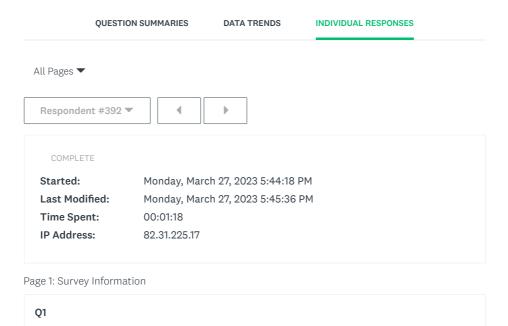
We note that the final paragraph of the replacement policy ENV1 requires an exposure mitigation strategy where there is potential for new occupants to be exposed to unacceptable levels of air pollutants, but, unlike the previous policy version, it does not require measures to be in place to mitigate and prevent further exposure. It also now conspicuously fails to say anything about existing residents similarly affected and is therefore non-compliant with NPPF 2012 para 124. Finally, it does not define what is unacceptable. The policy therefore lacks clarity for both applicants and those potentially negatively affected and is too weak to ensure residents are effectively protected. We recommend that further amendments be made to the amended policy final paragraph to satisfactorily address all the above issues.

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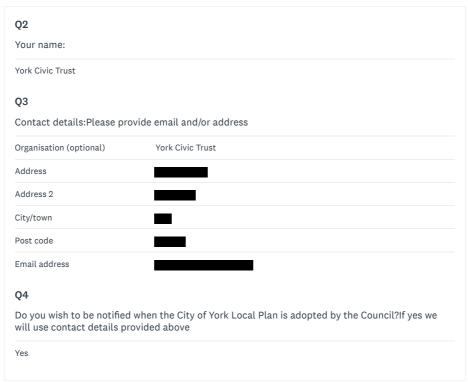




Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in

Page 2: Register for consultation

order to take the survey.



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

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Q6

To which section does this response relate?

Section 12: Environmental Quality and Flood Risk

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

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COPY

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

015

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

MM12.2 Policy ENV1 Explanation

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Q23

If you object, please select your reason from the list below (select all that apply):

Not effective - i.e. it won't work

Not consistent with national policy - i.e. doesn't comply with the law

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

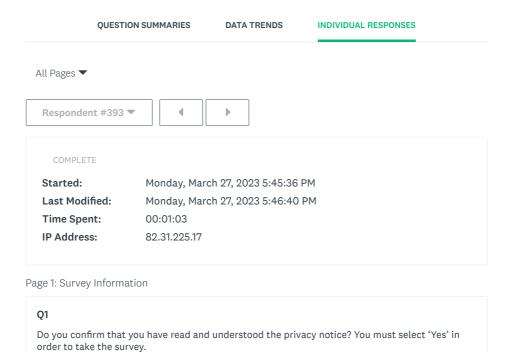
We note a similar weakening in the supporting text of 12.6 and 12.7 on the issues we flag above about Policy ENV 1 (see MM12.1), and which we oppose for the same reasons. They also delete the requirement for an SPD, which was seen as a core means of implementing the Council's Low Emission Strategy (Submission Doc SD093). We recommend reinstatement and further amendment to the amended policy text to satisfactorily address these issues.

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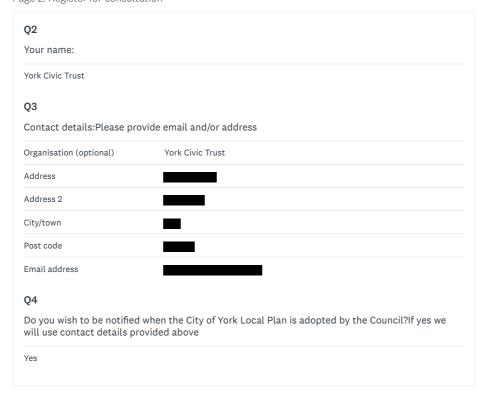








Page 2: Register for consultation



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.





Q6

To which section does this response relate?

Section 14: Transport and Communications

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Share Link

COPY

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

015

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

MM14.1 Section 14 Introduction - paragraphs 14.2-14.3

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Q23

If you object, please select your reason from the list below (select all that apply):

Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

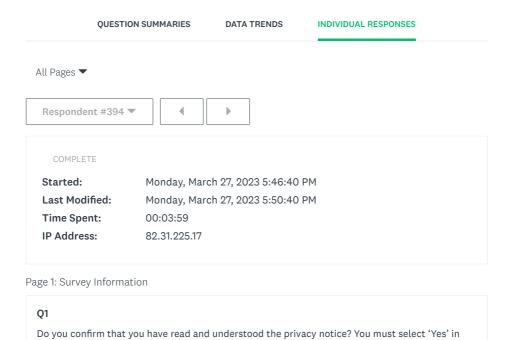
We welcome the references in para 14.3a to the forthcoming Local Transport Strategy and fourth Local Transport Plan (LTP4) and in para 14.3b to the forthcoming LCWIP and BSIP. However, we note that Policies T2, T4 and T5 are still based on LTP3, which was published 12 years ago and is now seriously out of date. Basing future development decisions on an outdated Local Transport Plan makes it unsound. Since it is now accepted that LTP4 will be published within the next 15 months, we strongly recommend that all references to LTP3 (and particularly those in Policies T2, T4 and T5) be modified so that it is clear that interpretation of these policies will in future be determined by LTP4. We note that this is the approach adopted in Policy T5 in relation to the as yet unpublished LCWIP, and see no justification for treating LTP4 differently.

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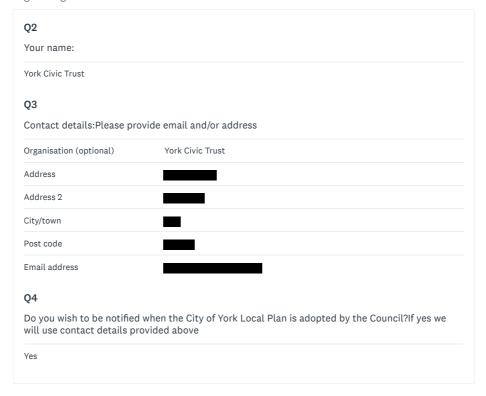






Page 2: Register for consultation

order to take the survey.



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.





Q6

To which section does this response relate?

Section 14: Transport and Communications

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Share Link

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To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

MM14.3 Policy T1 explanation - paragraph 14.4

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Q23

If you object, please select your reason from the list below (select all that apply):

Not effective - i.e. it won't work

Not consistent with national policy - i.e. doesn't comply with the law

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

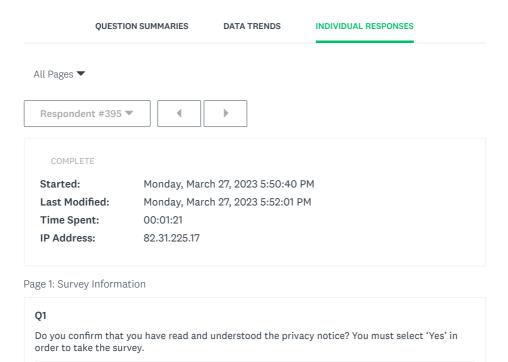
All references in paras 14.8, 9, 12 & 13 to detailed specifications of standards in a forthcoming SPD have been deleted and replaced by a much vaguer statement in para 14.14a. Moreover, the outline for a new SPD on Sustainable Transport fails to list the specific standards for access to public transport or service frequency (currently found in paras 14.8 and 9), and no date is given for the SPD's publication. It makes the Plan unsound, providing opportunity for development prior to any SPD to create new communities with inadequate public transport, under-provision of cycle parking and over-provision of car parking, all of which would run counter to the Plan's objectives, NPPF12 paras 17, 28, 32, 35, 41, 58 & 156 and DfT's 2015 guidance on Transport evidence bases in plan making and decision taking paras 2, 3, 5 & 8. We recommend that para 14.14a is modified to specify that, prior to publication of the SPD, standards will be those specified in the 2005 Development Control Local Plan.

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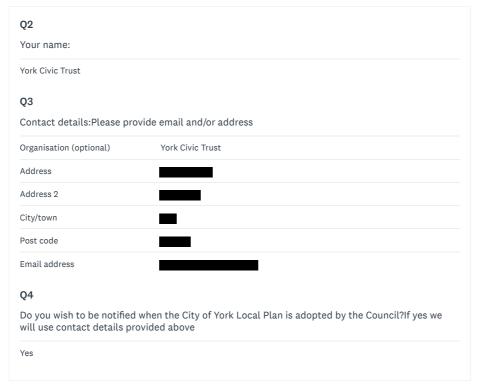








Page 2: Register for consultation



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

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Q6

To which section does this response relate?

Section 14: Transport and Communications

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Share Link

COPY

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

015

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

MM14.4 Policy T2: Strategic Public Transport Improvements

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Q23

If you object, please select your reason from the list below (select all that apply):

Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

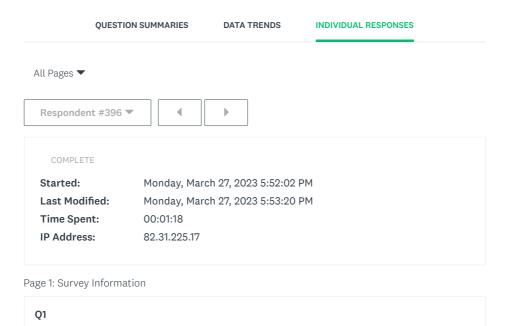
This modification removes the detailed list of public transport improvements, and thus leaves them subject to disruption by development prior to their inclusion in the IDP. We recommend that the detailed list of schemes in Policy T2 is reinstated, to ensure that they are protected from development. The revised, shortened, list of major schemes is generally appropriate to serve the needs of the largest new developments. But failure to identify services for other developments makes the Plan unsound, in that it would permit development which was incompatible with the Plan's objectives and the requirements of NPPF12. We recommend that reference be reinstated to the need to provide dedicated bus services to other major developments, including ST5, ST7, ST8 and ST9.

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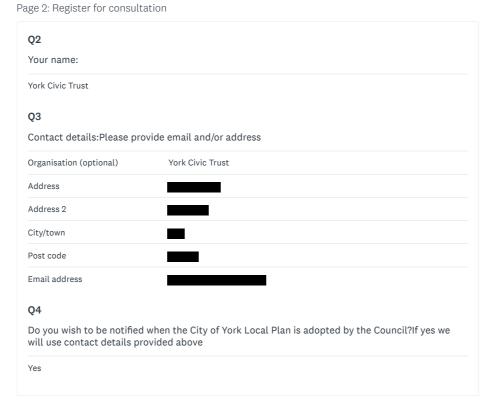






Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in

order to take the survey.



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.





Q6

To which section does this response relate?

Section 14: Transport and Communications

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

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To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

015

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

MM14.7 Policy T4: Strategic Highway Network Capacity Improvements

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Q23

If you object, please select your reason from the list below (select all that apply):

Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

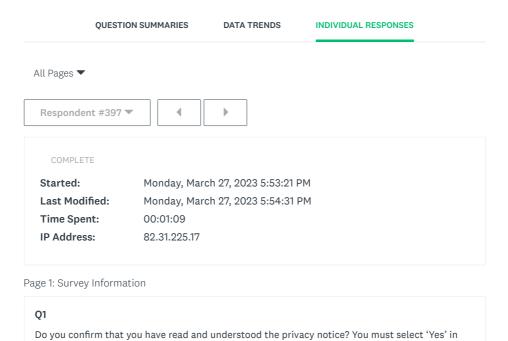
This modification includes a grade-separated junction of the A64 and dualling the A1237 west, for which no case has been made in the Plan's lifetime. No reference is made to the requirements for managing the existing road network to achieve the 20% reduction in car use required by the Council's climate strategy (CYC/EX/104). This makes the Plan unsound in that, in the absence of effective traffic management, such highway investments will add to private vehicle traffic, adversely affect sustainable travel, and thus be counter to the Plan's objectives and the requirements of NPPF12. This is demonstrated by the assessment of the dualling of the A1237 north, which shows a 90% increase in traffic on it, but at most a 7% reduction in inner York. We recommend that the references to the grade-separated junction with the A64 and dualling of the western outer ring road be deleted, and the Policy expanded to emphasise the role of effective traffic management on the existing highway network.

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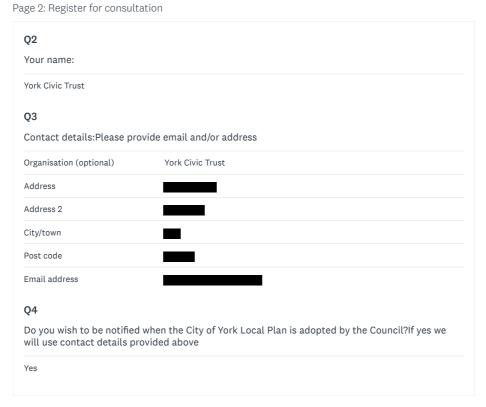








order to take the survey.



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

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Q6

To which section does this response relate?

Section 14: Transport and Communications

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

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To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

015

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

MM14.8 Policy T5: Strategic Cycle and Pedestrian Network Links and Improvements

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)	Do you suppor	or object to the	proposed modificati	ion(s)?
----------------------------------------------------------	---------------	------------------	---------------------	---------

Q23

If you object, please select your reason from the list below (select all that apply):

Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

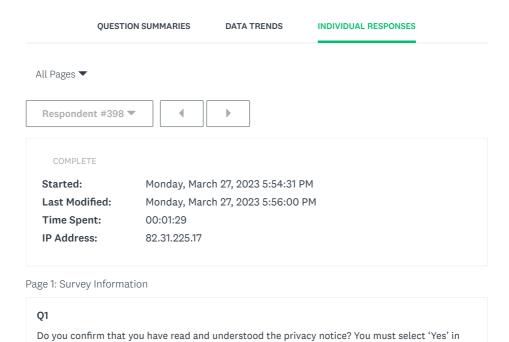
The detailed list of schemes has been deleted and replaced by three much less specific statements, leaving specific schemes vulnerable to inappropriate development. We recommend that the detailed list of schemes in Policy T5 is reinstated, to ensure that they are protected from development. The reference to the Council developing "a comprehensive network ..." "through York's LCWIP, which is currently being researched" is misleading. In practice the LCWIP is to be based on ten strategic cycling corridors and four key walking zones, and will thus not provide a comprehensive network. It is essential that the Council produces an updated comprehensive network if it is to deliver the doubling of active travel trips required by 2030 for the Climate Change Strategy (EX/CYC/104). We recommend that the reference to the LCWIP in para 14.40 is modified to read: "... which will be developed in part through York's LCWIP and in more detail in LTP4, and will be fully reflected in an updated IDP".

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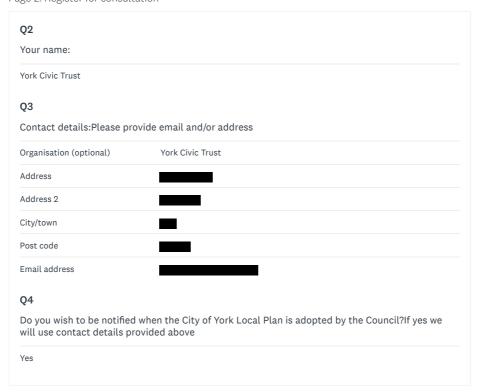






Page 2: Register for consultation

order to take the survey.



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.





Q6

To which section does this response relate?

Section 14: Transport and Communications

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

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To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

015

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

MM14.9 Policy T6: Development at or Near Public Transport Corridors, Interchanges and Facilities

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support	or object to the	nronosad	modification(s)?
DO VOU SUDDOIL	or object to the	e brobosed	modification(s)?

Q23

If you object, please select your reason from the list below (select all that apply):

Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

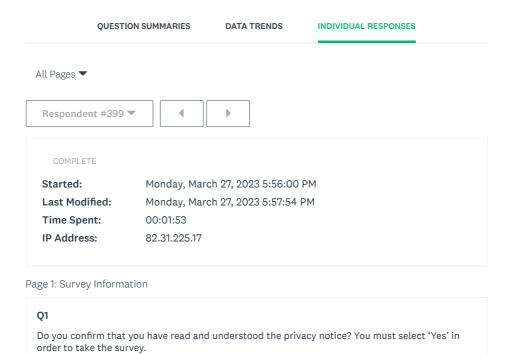
We are concerned by the omission of the following three justifications for not accepting development near to public transport facilities where it would: • generate a demand for travel by private motorised vehicles that is likely to be unsustainable either in the location of the development or on the wider highway network; or • have an adverse impact on the character, historic and natural environment and amenity of the area in the vicinity of the development, or • compromise the purpose of the Green Belt. Omission of the first of these would explicitly permit high traffic generating developments which could prejudice the operation of the public transport facility. The other two should be standard conditions for rejecting development. We recommend that these three justifications be reinstated.

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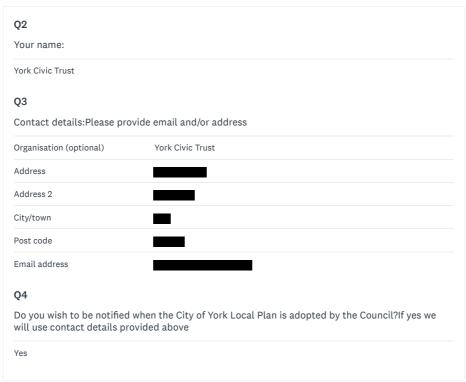








Page 2: Register for consultation



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.





Q6

To which section does this response relate?

Section 14: Transport and Communications

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

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To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

015

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

MM14.11 Policy T8: Demand Management

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Q23

If you object, please select your reason from the list below (select all that apply):

Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

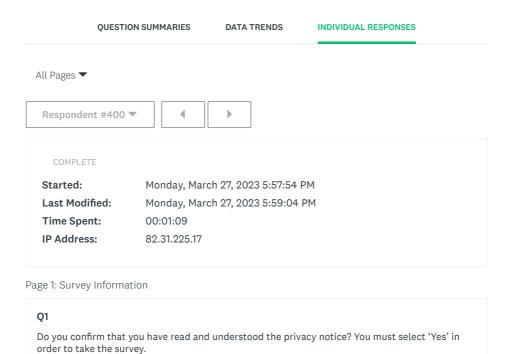
No reference is given for the Council's guidance on parking standards. Revised standards are to be included in the Sustainable Transport SPD, but no date is given for this. This is unsound, and risks over-provision of parking. We recommend that Policy T8 is modified to specify that, prior to publication of the SPD, parking standards will be those specified in the 2005 Development Control Local Plan. The Policy requires developments to "incorporate appropriate demand management measures", but the modifications are inadequate in their coverage of the types of measure. We recommend the following are added: • Support for working, studying and shopping from home (linked to Policy C1); • Design of new communities to reduce the need to travel (linked to Policies DP2 and SS1); • Personal, workplace and school travel plans; • Road network management (linked to Policy T4); • Parking charges to influence car use; and • Workplace parking levies and road pricing.

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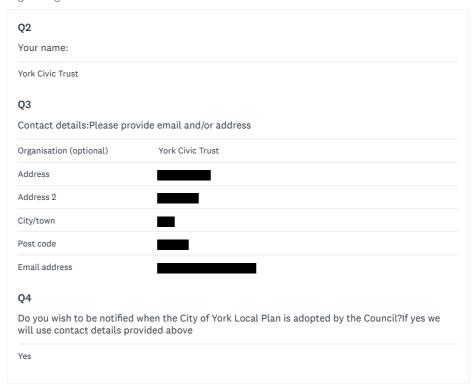








Page 2: Register for consultation



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

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Q6

To which section does this response relate?

Section 15: Delivery and Monitoring

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

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To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

015

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

MM15.3 Policy DM1 explanation – paragraph 15.15 and Table 15.1 $\,$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Q23

If you object, please select your reason from the list below (select all that apply):

Not consistent with national policy - i.e. doesn't comply with the law

Q24

Please set out the reasoning behind your support or objection:Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

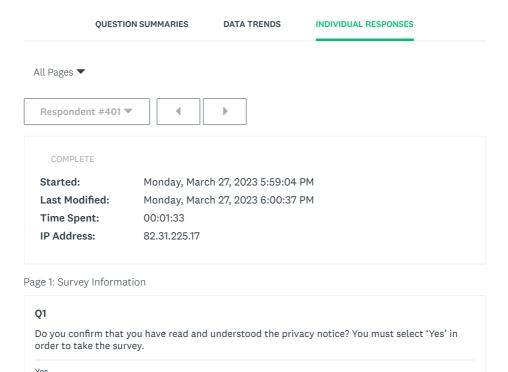
This modification is based on analysis in EX/CYC/87a. No reference is made to EX/CYC/91, which assesses the impact of development on carbon and local air pollutant emissions from transport. The analysis in these support documents is unsound, as is the modification in para 15.15. NPPF 2012 specifies that the impact of the anticipated development, however it is distributed, should be compared with the situation without such development. DfT (2015) states that Local Plan transport assessments should ensure that "any proposed land allocation impact is considered in the context of two alternative scenarios – 'with development' and 'without development'" and thus "enable a comparative analysis of the transport effects of the proposed allocation." The Council has failed to make this comparison in CYC/87a and CYC/91. We recommend that para 15.15 is further modified to acknowledge these limitations, and to make clear that they will be remedied in LTP4.

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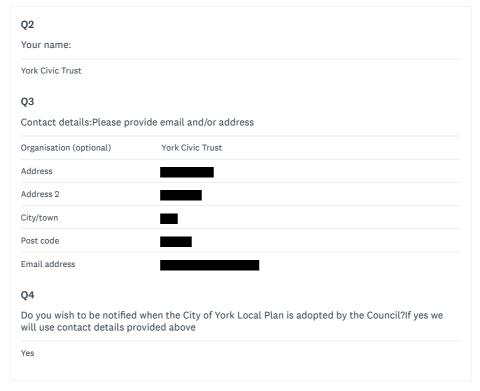








Page 2: Register for consultation



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

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Q6

To which section does this response relate?

Respondent skipped this question

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Share Link

COPY

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

015

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

EX/CYC/87a - Local Plan Modelling Report

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Q23

If you object, please select your reason from the list below (select all that apply):

Not consistent with national policy - i.e. doesn't comply with the law

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

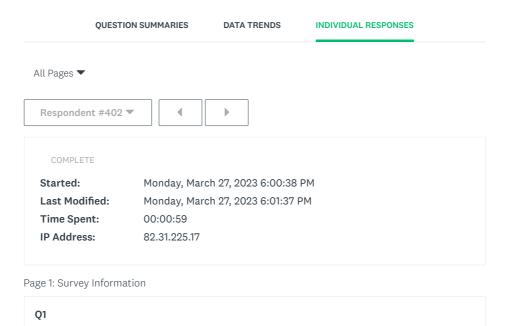
The Council has not assessed, as required by DfT (2015), "whether improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development." There is no assessment of the improvements needed to limit the significant impacts arising from the strategic developments proposed in the Plan. There is thus no basis on which to argue that the measures proposed in Policies T1-9 are either necessary or sufficient to limit these impacts, or that the residual cumulative impacts will not be severe. The analysis in CYC/87a and CYC/91 fails to satisfy the requirements of NPPF 2012 or DfT (2015) and is thus unsound. A thorough analysis is required of the impacts, on all indicators, of the set of proposed strategic developments. Revisions to Policies T1 to T9 should then reflect the resulting requirements. A commitment should be given for this analysis to be conducted in preparation for LTP4, and reflected in an early revision to the Plan.

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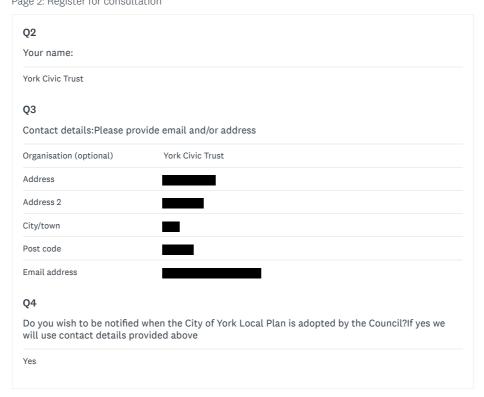




Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in

Page 2: Register for consultation

order to take the survey.



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

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Q6

To which section does this response relate?

Respondent skipped this question

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Share Link

COPY

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

015

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

EX/CYC/91 - Comparative Effects Of Different Spatial Distributions

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Q23

If you object, please select your reason from the list below (select all that apply):

Not consistent with national policy - i.e. doesn't comply with the law

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

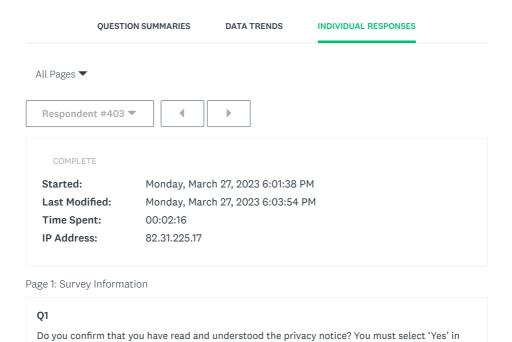
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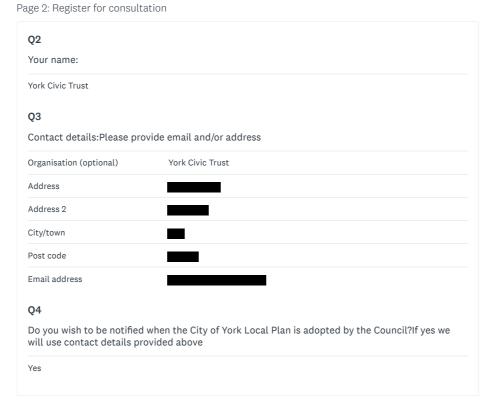








order to take the survey.



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.





Q6

To which section does this response relate?

Section 7: Education

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

MM7.8 Policy ED3 explanation – paragraphs 7.6 to 7.12

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Share Link

COPY

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

015

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Do you support or object to the proposed modification(s)?

Q23

If you object, please select your reason from the list below (select all that apply):

Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

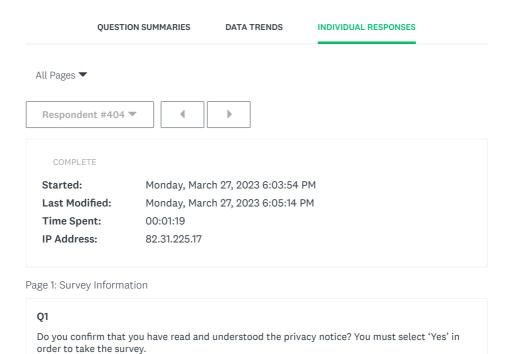
Several Modifications have removed detail from the Local Plan leaving further clarification for subsequent SPDs. (See MM7.8 para7.10; MM12.2, paras12.7, 12.9; MM14.10 para14.49; MM14.11; AM6.1 para6.4; AM6.16 para6.47; AM9.2 para9.3; AM11.4 para11.7; AM14.2 paras14.8-14.9, 14.12-14.14a; AM14.21 para14.55). Neither the list of Modifications nor the evidence base provides publication dates for the SPDs. As the Council's Executive has approved the removal of a range of SPD's from the Local Plan outside of the Planning Inspectors' inquiries and the statutory consultation, planning applications received are at risk of being determined on the policies of the Plan alone and without the specific guidance of the unpublished SPD's. This could result in the Council's targets, for example for climate change, health & wellbeing, culture & heritage, and sustainable travel, being undermined. The Civic Trust recommends the Council provide a SPD publication programme for all relevant Policies.

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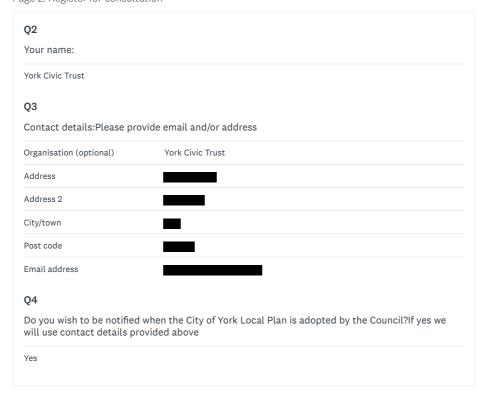








Page 2: Register for consultation



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

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Q6

To which section does this response relate?

Section 12: Environmental Quality and Flood Risk

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

Q10

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

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To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

015

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

MM12.2 Policy ENV1 Explanation

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Q23

If you object, please select your reason from the list below (select all that apply):

Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

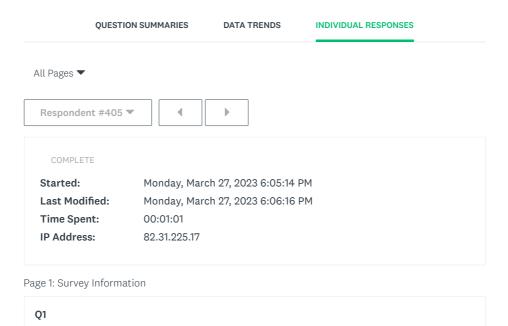
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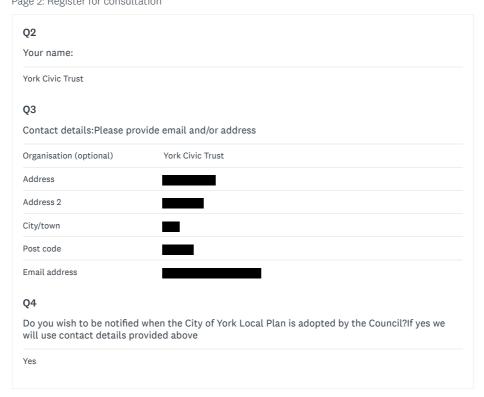




Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in

Page 2: Register for consultation

order to take the survey.



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

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Q6

To which section does this response relate?

Section 14: Transport and Communications

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

Share Link

COPY

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

015

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

MM14.10 Policy T7 Explanation - paragraph 14.49

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Q23

If you object, please select your reason from the list below (select all that apply):

Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

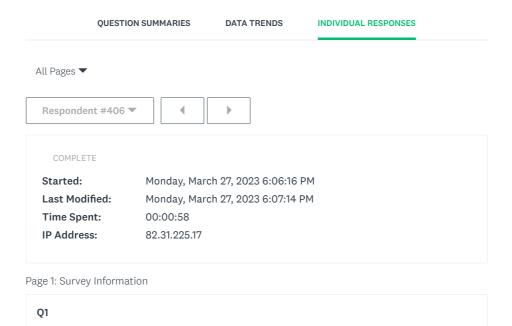
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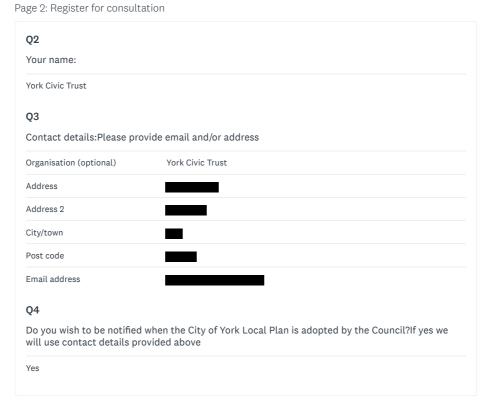






Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in

order to take the survey.



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

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Q6

To which section does this response relate?

Section 14: Transport and Communications

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

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COPY

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

015

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

MM14.11 Policy T8: Demand Management

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Q23

If you object, please select your reason from the list below (select all that apply):

Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

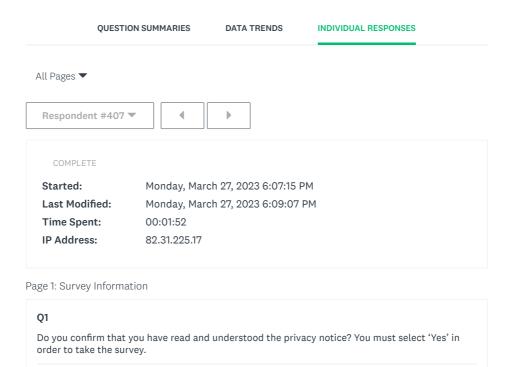
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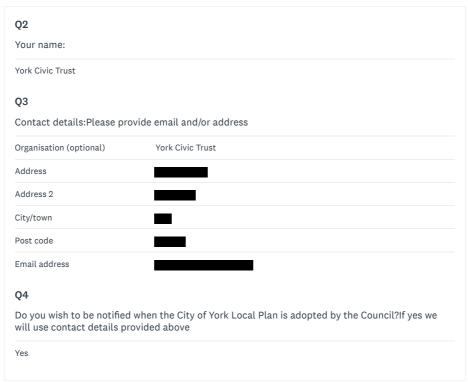








Page 2: Register for consultation



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.





Q6

To which section does this response relate?

Section 6: Health and Wellbeing

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

MM6.4 Policy HW1 explanation - paragraph 6.10

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

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To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Q23

If you object, please select your reason from the list below (select all that apply):

Not positively prepared - i.e. strategy will not meet development needs

Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

Several of the modifications include qualifiers such as "reasonably" or "not reasonably" (made on 11 occasions, see MM6.4, para6.10; MM14.2; and unmodified paragraphs and Polices: para 3.36; para 3.94; para 5.53; para 12.29; para 12.36; Policy T1, Policy T7) which are open to a range of interpretations. These could reduce planning officers' ability to negotiate amendments to developer proposals and limit their ability to recommend rejection of planning applications which would otherwise be contrary to the Council's and the Plan's objectives.

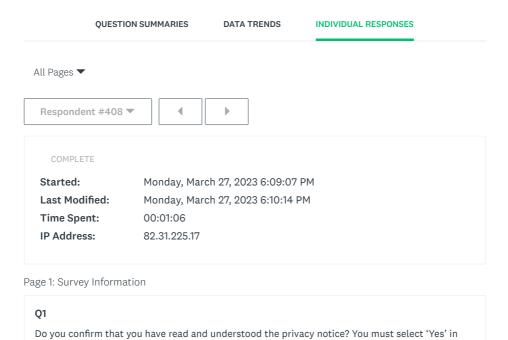
Unambiguous wording and intent will also give more certainty to applicants. We recommend that all such qualifiers be omitted, or replaced by wording whose interpretation is more tightly specified.

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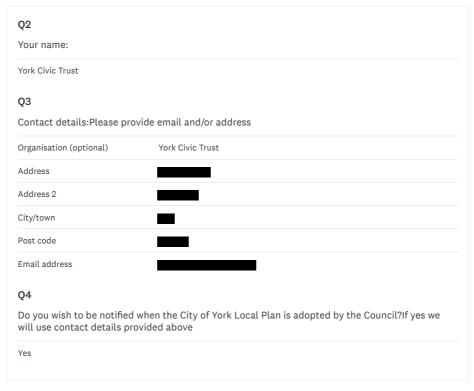






Page 2: Register for consultation

order to take the survey.



Page 3: Your response

Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

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Q6

To which section does this response relate?

Section 14: Transport and Communications

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

010

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

Q11

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

Q12

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

Q13

To which modification does this response relate?

Respondent skipped this question

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COPY

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

015

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

MM14.2 Policy T1: Sustainable Access

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

 $\label{eq:Respondent} \textbf{Respondent skipped this question}$

Page 18: Proposed Policy Map Modifications

020

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

Q23

If you object, please select your reason from the list below (select all that apply):

Not positively prepared - i.e. strategy will not meet development needs

Not effective - i.e. it won't work

Q24

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

Several of the modifications include qualifiers such as "reasonably" or "not reasonably" (made on 11 occasions, see MM6.4, para6.10; MM14.2; and unmodified paragraphs and Polices: para 3.36; para 3.94; para 5.53; para 12.29; para 12.36; Policy T1, Policy T7) which are open to a range of interpretations. These could reduce planning officers' ability to negotiate amendments to developer proposals and limit their ability to recommend rejection of planning applications which would otherwise be contrary to the Council's and the Plan's objectives. Unambiguous wording and intent will also give more certainty to applicants. We recommend that all such qualifiers be omitted, or replaced by wording whose interpretation is more tightly specified.

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